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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Billed Party Preference	)	CC Docket No. 92-77
for 0+ InterLATA Calls	)	

REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

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August 27, 1992

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SUMMARY

In these reply comments, U S WEST Communications, Inc. ("USWC") buttresses its initial comments regarding the costs and benefits of billed party preference. In USWC's view, billed party preference makes sense if certain key issues can be resolved. Specifically, if implementation of billed party preference is required, USWC stresses the importance of assuring the full recovery of the costs of implementing and providing billed party preference; the propriety of requiring universal implementation of billed party preference, including non-equal access end offices as well as equal access end offices; and the propriety of requiring all traffic aggregators and payphone providers to adhere to the billed party preference routing plan adopted.

USWC also counters the assertions of certain commenting parties concerning the results and benefits of payphone competition. In particular, USWC questions the claims that payphone competition has resulted in substantial increases in the number and availability of payphones and that 80% of payphones installed by private payphone providers ("PPP") have been at new locations that were not previously served by local exchange carriers ("LEC"). While it agrees that commission payments to payphone premises owners have grown significantly since the beginning of competition, USWC suspects that the higher payments are a consequence of more competitors vying for the same space

rather than a substantial increase in the number or availability of payphones or an increase in the value of the premises owner's space. USWC also states that the PPP share of the payphone market is greater than 10%, as one party claims, especially where payphone usage is concerned, and that the only "innovations" spawned by payphone competition are automatic dial around and store-and-forward devices and technologies, which may be of more benefit to PPPs than to consumers.

In conclusion, for the reasons stated in its initial comments and this reply, USWC reiterates its belief that if billed party preference is required, it should be (1) required of all LECs; (2) applied to all 0+ and 0- interLATA traffic (including interLATA calling card, collect and bill-to-third-number and person-to-person calls initiated with 0+ and 0-dialing); (3) buttressed by the Federal Communications Commission prohibition of the use of auto dialing mechanisms to program telephones to dial around billed party preference on 0+ and 0-interLATA calls; and (4) premised on full recovery of the costs of implementing and providing billed party preference.

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REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

U S WEST Communications, Inc. ("USWC"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking in this proceeding,[1] hereby submits these reply comments regarding the proposed automatic "billed party preference" routing methodology for 0+ interLATA payphone traffic and other operator-assisted interLATA traffic.

I. INTRODUCTION AND BACKGROUND

In its initial comments in this proceeding concerning billed party preference, USWC, inter alia, provided estimates of the costs it would incur to implement billed party preference for interLATA payphone traffic alone (approximately $113 million) and for all 0+ and 0- traffic from any telephone (approximately $149 million); discussed the double operator system problem; estimated the impact billed party preference would have on access times for operator service calls (an additional .5 second to 2 seconds with Signaling System 7); proposed Commission action to minimize the

[1] Billed Party Preference for 0+ InterLATA Calls, 7 FCC Rcd. 3027 (1992) ("NPRM"); Order, DA 92-1058, rel. July 31, 1992, extending deadline for filing reply comments to August 27, 1992.

impact that billed party preference would have on payphone competition; and favored the assignment of a 0+ carrier by default to the customer's chosen 1+ carrier.[2]

In more general comments, USWC cautioned the Commission that, if ordered, billed party preference should be (1) required of all local exchange carriers ("LEC"); (2) applied to all 0+ and 0- interLATA traffic (including interLATA calling card, collect, bill-to-third-number and person-to-person calls initiated with 0+ and 0- dialing); (3) buttressed by Commission prohibition of the use of auto dialing mechanisms to program telephones to dial around billed party preference on 0+ and 0- interLATA calls; and (4) premised on full recovery of the costs of implementing and providing billed party preference.

USWC believes, and affirms in these reply comments, that billed party preference makes sense if certain key issues can be resolved. Specifically, if implementation of billed party preference were required, USWC stresses the importance of assuring the full recovery of the costs of implementing and providing billed party preference; the propriety of requiring universal implementation of billed party preference, including non-equal access end offices as well as equal access end offices; and the propriety of requiring all traffic aggregators and payphone providers to adhere to the billed party preference routing plan adopted. USWC also counters the assertions of

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[2] See generally Comments of USWC Concerning Billed Party Preference, filed herein July 7, 1992 ("USWC Comments").

certain commenting parties concerning the results and benefits of payphone competition.

II. FULL RECOVERY OF BILLED PARTY PREFERENCE COSTS IS OF PARAMOUNT IMPORTANCE

The initial round of comments in this portion of this proceeding, filed on or about July 7, 1992, is replete with concern that the costs of implementing billed party preference must be fully recoverable.[3] This common concern is only reasonable given the considerable sums that would be required to implement a uniform routing scheme for operator-assisted calls.

USWC believes that a further or supplemental notice should be issued by the Commission to explore the appropriate manner of recovering the costs of billed party preference, should that routing plan be required. Further, USWC believes that the cost recovery mechanism for billed party preference should allocate the costs to those who derive the greatest benefit from the service. Given the interests of state regulatory commissions in this matter,[4] and given the fact that traditional separations

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[3] See, e.g., Comments of the Ameritech Operating Companies at 3 ("Ameritech Comments"); Comments of Bell Atlantic at 6-7 ("Bell Atlantic Comments"); Comments of GTE Service Corporation at 12-13 ("GTE Comments"); Comments of the NYNEX Telephone Companies at 4 ("NYNEX Comments"); Comments of Pacific Bell and Nevada Bell at 23-24 ("Pacific Telesis Comments"); Comments of the Southern New England Telephone Company at 5 ("SNET Comments"); and Comments of Southwestern Bell Telephone Company at 12 ("Southwestern Bell Comments").

[4] See generally Comments of the Florida Public Service Commission; Comments of the Illinois Commerce Commission, the Indiana Utility Regulatory Commission, the Public Utilities
(continued...)

methodology will allocate the majority of the costs of billed party preference to the state jurisdiction, the Commission should consider delegating this matter to a federal/state joint board.[5]

Another issue with respect to the potential costs of implementing billed party preference should also be the focus of further Commission action. USWC notes that there is a wide range of estimates of these costs. To a considerable degree, these differing estimates are based on more than factors such as the individual party's traffic volume or equipment type. In USWC's view, the widely ranging cost estimates illustrate different concepts of billed party preference, with respect to the types and amounts of traffic to be included, as well as different views as to the features and functions billed party preference should encompass.

Given the apparently divergent concepts of billed party preference and the impact such divergence has on cost estimates, USWC proposes that the Commission act to create a single, uniform definition of billed party preference upon which all interested

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[4](...continued) Commission of Ohio and the Public Service Commission of Wisconsin; Staff Comments of the Michigan Public Service Commission; Comments of the Pennsylvania Public Utility Commission; and Comments of the Michigan Public Service Commission. <u>See also</u> Southwestern Bell Comments at 12; USWC Comments at 19 n.24.

[5]Other parties have suggested more aggressive Commission action on cost recovery. For example, NYNEX contends that "the most appropriate method for recovering the costs of billed party preference would be through an increase in the End User Common Line ('EUCL') charge." NYNEX Comments at 4. Bell Atlantic argues that the costs related to billed party preference are exogenous. <u>See</u> Bell Atlantic Comments at 5-7.

parties can base their cost estimates. This single definition should specify the types of traffic to which the billed party preference routing plan would apply, as well as the features and functions that certain participants in the routing plan would be required to provide. If, as has been proposed, the Commission were to adopt a plan calling for the initial implementation of a basic billed party preference plan, to be followed by other features and enhancements in a later phase,[6] such requirements should also be spelled out in as much detail as possible.

USWC believes that by placing all participants on common ground as to their understanding of what is required, the Commission would receive a more accurate picture of the potential costs of requiring billed party preference. This single service definition would also send the correct signals to equipment manufacturers and software vendors regarding the potential requirements of their customers. Of course, once those requirements are defined, carriers, aggregators, payphone providers, and vendors should be free to meet those requirements using the technologies, equipment and software solutions of their own choosing.

III. IF REQUIRED, BILLED PARTY PREFERENCE SHOULD BE IMPLEMENTED IN EQUAL ACCESS, AS WELL AS NON-EQUAL ACCESS, END OFFICES

In its most recent filing on this subject, USWC stated that if billed party preference were required it should be implemented

[6] See, e.g., Ameritech Comments at 4; and GTE Comments at 8.

universally, that is by all LECs.[7] USWC also noted that the majority of independent LECs have the same types of operator service switches ("OSS") as USWC and, "[t]hus, there is no apparent technical reason to exclude [independent] LECs from any requirement to implement billed party preference."[8]

This view is shared by the United States Telephone Association ("USTA"), a principal voice of independent LECs. Reaffirming its earlier statement regarding billed party preference, USTA stated that:

> Recognizing that the Commission had conferred different equal access obligations and requirements on independent telephone companies, USTA stated nevertheless that a uniform national policy for billed party preference was needed, supported by clear, non-illusory rules that apply to all 0+ and 0- access providers.[9]

Moreover, there is no apparent reason to exclude non-equal access end offices from the billed party preference routing plan.

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[7]USWC stated that:

> To require billed party preference of some but not all LECs would perpetuate the confusion created by the need to use different dialing alternatives depending on where the caller happens to be at any given time. Less than universal implementation would also dilute the clear end-user/consumer benefits promised by billed party preference. If billed party preference is required, it should be mandatory for all LECs.

USWC Comments at 16.

[8]_Id_.

[9]Comments of USTA at 2 ("USTA Comments").

Little or no expense will be required to implement billed party preference in non-equal access exchanges. As noted by Sprint Corporation ("Sprint"):

> Sprint believes that the presence or absence of equal access in a given end office will not impact the availability of billed party preference. When a 0+ call originates from a non-equal access exchange, the call will be forwarded to the operator tandem, where a query will be launched to determine the presubscribed IXC (either chosen or default), with the call then being handed to that IXC. This is not unlike what occurs when a 0+ call originates in an equal access office. In effect, the presubscription of the 0+ carrier is an operator tandem/LIDB intelligence feature and not an end office intelligence feature.[10]

For these reasons, USWC reiterates its conviction that, if ordered, billed party preference should be required of all LECs, aggregators and payphone providers.

IV. THE USE OF AUTOMATIC DIALING MECHANISMS TO DEFEAT BILLED PARTY PREFERENCE MUST BE PROHIBITED

In its initial comments, USWC urged the Commission to consider amending Part 68 of the Commission's Rules to preclude aggregators and payphone providers from using automatic dialing mechanisms to "dial around" billed party preference on operator-assisted calls.[11] Certain parties, such as the American Public

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[10]Comments of Sprint at 30 ("Sprint Comments").

[11]The use of such mechanisms would (1) frustrate the primary benefit of billed party preference, i.e., provider assurance to the billed party that his or her chosen carrier will handle the
(continued...)

Communications Council ("APCC"), oppose such consideration as being inconsistent with Commission policies and the intent of Congress in enacting the Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA") and citing consumer benefits resulting from the use of such mechanisms.[12]

USWC does not dispute the existence of some consumer benefits related to the use of "smart payphones" and store-and-forward technologies. However, there also exists a fundamental conflict between the use of such devices and technologies and the expected benefits of billed party preference. Either the person paying for the call must determine the carrier to handle the call, as is the case under billed party preference, or the owner of the originating station must control the choice of carrier, as would occur with the use of automatic dialing mechanisms. Some hybrid of the two environments would be the worst of all possible outcomes, maximizing consumer confusion and frustrating dialing simplicity.

The Commission will most likely be challenged no matter how it decides this issue. USWC presumes that the Commission is aware of its own policies and will take them into careful consideration in coming to its conclusion on whether billed party

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[11](...continued)
call; (2) frustrate any billed party preference cost recovery mechanism by converting 0+ calls to 1+ or 1-800-XXX-XXXX calls; and (3) further devalue the benefits of billed party preference due to their increasing deployment, given the economic incentives underlying their use. See USWC Comments at 16-17.

[12]See Comments of the Inmate Calling Service Providers Task Force of the APCC at 4-16 ("APCC Comments").

preference is or is not in the public interest.[13]

V. PRIVATE PAYPHONE PROVIDER COMMENTS CONCERNING PAYPHONE COMPETITION ARE MISLEADING AND INACCURATE

In the preceding round of comments, certain parties have provided information and made assertions regarding payphone competition which cannot be squared with USWC's own data and experience. Generally, these parties contend that the emergence and proliferation of private payphone providers ("PPP") have substantially increased the number and availability of payphones to consumers.[14] It is also implied that this alleged increase in the availability of payphones is due primarily, if not solely, to the commissions paid to PPPs by competing operator service providers ("OSP") for the right to handle 0+ interLATA calls that originate from the PPPs' stations.[15] According to CompTel, these commission payments often make up more than 40% of PPP

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[13]Even if Part 68 is not the proper avenue to address the use of automatic dialing mechanisms, the Commission cannot escape the polarity between the use of such mechanisms with operator-assisted calls and the adoption of a billed party preference routing scheme.

[14]For instance, California Payphone Association ("CPA") states that "80% of competitively owned payphone installations during the past several years has been at new locations that were not previously served by the local exchange carrier[.]" Comments of CPA at 2. According to Opticom, "[p]rivate payphones represent only 10% or less of the market despite the fact that OSPs have always offered commissions on interLATA private payphone traffic." Comments in Opposition to Notice of Proposed Rulemaking of One Call Communications, Inc. d/b/a OPTICOM at 28 ("Opticom Comments").

[15]See, e.g., Comments of the Competitive Telecommunications Association at 25-26 ("CompTel Comments").

revenues.[16] It is argued that if these revenues were lost due to Commission action requiring the implementation of billed party preference, the public would lose the benefits of broader payphone availability and the innovative services provided by PPPs.[17]

USWC takes issue with these claims, particularly with respect to payphone competition in USWC's region. Currently, PPPs have a 20% share of the market for payphone locations in the USWC territory. This 20% share, in fact, translates to a 30% share of payphone usage.[18] These percentages are probably low compared to other Regional Bell Operating Companies ("RBOC"), given the rural and remote nature of the USWC region and its comparatively lower population density.

From the onset of competition in the USWC region in 1984 to the present, the total payphone market (public and private) in that region has grown less than 2% per year. Prior to competition in the five states that comprised the old Northwestern Bell Telephone Company ("NWB"), the only USWC states where data could be compiled, total NWB payphones grew from 39,400 in 1978 to 43,092 in 1983. This was nearly the same 2%

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[16]See id. at 26 (citing APCC Comments on CompTel's Emergency Motion in CC Docket No. 91-115, filed Feb. 10, 1992, at Exhibit 2).

[17]See, e.g., CompTel Comments at 25-26; Opticom Comments at 15.

[18]Usage is a more appropriate measure of market penetration, because it is usage, not locations, that produces revenues, profits, and premise owner compensation resources.

annual growth rate.

Total growth of payphone locations has remained a constant 2% both prior to competition (the 1978 - 1983 period) and since competition was initiated (1984 to the present). This flat growth rate indicates that any influence that private payphones have had on the total number and availability of payphones has been minimal, if any.

USWC's data does not support the claim that up to 80% of private payphones have been at new locations that were not previously served by the LEC. On the contrary, if USWC's pre-competition base of 140,000 payphones had grown 2% per year, as did NWB's payphones from 1978 through 1983, the total number of USWC payphones would have been nearly identical to the 160,000 combined (PPP and USWC) payphones currently in service.

USWC agrees that commission payments to payphone premises owners have grown significantly since the emergence of competition. Prior to 1985, USWC paid commissions for "space rental" to premises owners in the range of 5% of the total revenues generated. It is not unusual to see commission offers of 35% or more in today's competitive marketplace. Again, however, this growth in the level of compensation paid to premises owners has not substantially increased the numbers and availability of payphones. Rather, it appears that the higher level of commission payments is a consequence of more competitors vying for the same space, not an increase in the value of the premises owner's space or the ability to place more stations at a particular location.

If, indeed, 40% of PPP revenues are derived from OSP commissions, it would lend greater credence to the perception that the higher prices for OSP calling are due to the need to support much higher commission payments. In addition, this information would indicate to USWC that today PPPs have a significant advantage in revenue opportunity compared to USWC payphones, for which interstate Switched Access charges contribute only an estimated 13% of direct USWC payphone revenues.

Based on its own data, and contrary to the claims of others, USWC concludes that: (1) PPP market share is certainly greater than 10%, especially where usage is considered; (2) the proliferation of PPPs has not substantially increased the numbers and availability of payphones to the general public; (3) payphone competition has resulted in higher commission payments to PPPs; and (4) the only "innovations" spawned by payphone competition are automatic dial around and store-and-forward devices and technologies, which may be of more benefit to PPPs than to consumers.

USWC makes these corrections to the record to balance assertions that both contradict themselves and lead to an erroneous conclusion that private payphone competitors are somehow disadvantaged in competing with LEC payphones today, and would be even more so disadvantaged if billed party preference were mandated. USWC continues to assert that, if billed party preference is required, it must be required of all participants in the marketplace, including all payphone providers.

VI. CONCLUSION

For the reasons set forth in its previous comments and herein, USWC continues to believe that billed party preference makes sense if it is (1) required of all LECs; (2) applied to all 0+ and 0- interLATA traffic (including interLATA calling card, collect, bill-to-third-number and person-to-person calls initiated with 0+ and 0- dialing); (3) buttressed by Commission prohibition of the use of auto dialing mechanisms to program telephones to dial around billed party preference on 0+ and 0- interLATA calls; and (4) premised on full recovery of the costs of implementing and providing billed party preference from those who derive the most benefit from it.

Respectfully submitted,

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August 27, 1992

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 27th day of August, 1992, that I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via first class United States mail, postage prepaid, to the persons named on the attached service list.

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